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June 28, 2021

Matt Lombardo MVP Health Insurance Company 625 State Street Schenectady, NY 12305

Re: MVP Health Plan, Inc.

2022 Vermont Exchange Rate Filing – Small Group

SERFF Tracking #: MVPH-132824927

Objection #7

Dear Mr. Lombardo:

The following additional information is required for this filing.

Notice regarding proper responses:

- A minimum-acceptable response to quantitative questions from us must include a spreadsheet calculation with retained formulas such that we can replicate the calculations therein.
- Explanatory responses are merely a supplement to the spreadsheet material and in of themselves will constitute a lack of response.

Questions:

- Please explain why the propose 2022 rates for Small Group differ for Silver HDHP On-Exchange versus Off-Exchange, shown in "Rate Increase Exhibit 2021-2022 SMALL_SERFF_V2.xlsx. Since Small Group does not have CSR, it would be expected that these rates would be the equal. Please reconcile.
- 2. Regarding the response to question #6 of the previous objection a 2021 admin PMPM of \$33.98 was provided for small group and \$42.19 was provided for individual. We note that the combined weighted average of these two PMPM figures does not match the filed 2021 administrative PMPM of \$43.75. What are the new admin PMPM figures based upon? What is meant by the provided table's label, "Available" Admin PMPM?

To ensure that the review of your filing is completed before statutory deadlines, we expect you to respond as expeditiously as possible, but no later than June 30, 2020.

We trust that you understand these forms may not be used in Vermont until they are formally approved by the GMCB.

Sincerely,

Traci Hughes, ASA, MAAA Consulting Actuary Lewis & Filic To Lewis & Ellis, Inc.

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